NOV 05 2012

RECEIVED
OCT 23 2012

NPDES Permit Tracking No.: MAR05E690

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: LEACHGARNER

2. NPDES Permit Tracking No.: MAR05E690

3. Facility Physical Address:

a. Street: 49 PEARL STREET

b. City: ATTLEBORO c. State: MA d. Zip Code: 02703-

4. Lead Inspectors Name: DAVID REGAN Title: ENVIRONMENTAL COMPL.I.

Additional Inspectors Name(s): RON DUBUC GRP. FACILITY MANAGER

5. Contact Person: RON DUBUC Title: GRP. FACILITY MANAGER

Phone: 508-222-7400 Ext. 1205 E-mail: RDUBUC@LEACHGARNER.COM

6. Inspection Date: 09/12/2012

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
■ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ■ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
MAR05E690

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ■ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ■ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

When the benchmark monitoring reports were generated the company identified the facility hot spot as the shipping and receiving yard. The yard it where most industrial activity of loading and unloading of equipment and materials takes place as well as storage dumpsters (scrap metal, trash compacter dumpster, and wastewater copper metallic hydroxide sludge dumpster). That yard is also used for staging materials for shipment for final disposition or for equipment pre installation storage. The monitoring data did not present any information that couldn't be garnered from visual inspections from opacity and suspended solids. The benchmark monitoring sample from the yard area indicated the copper varied from 0.27 to 0.93 ppm which is higher in the control areas (parking areas) where there is minimal to no industrial area. During the bench mark monitoring conducted second quarter 2009 though the first quarter 2010.

Since the benchmark monitoring results and subsequent stormwater grab samples visual inspections the yard has become the focus of the company efforts to minimize its storm water impacts. We have developed written policies and procedures in line with best management practices. The practices tend to minimization of materials store in the yard to only transient storage and closure or cover materials that are stored. The dumpster as always covered and only uncovered to add or remove materials. There has been considerable emphasis on keeping the yard clean with minimal or very short term storage of materials.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

There is scant evidence of material entering the storm drains in the sample areas other than the shipping and receiving yard. The storm water in the other areas appears to be slightly tea colored probably due to tannin with little to no suspended solids and very few settable solids and with good clarity. Some of the parking areas will occasionally present a hint of oil sheen probably due to vehicle drips but mostly no sheen is encountered at all. There is no odor associated with any of the samples from the parking lot or any of yard areas.

In the shipping and receiving yard visual inspection samples tend to present high opacity suspended solids. It can be difficult to view news print though the samples for that area.

Scouring doesn't seem to be an issue as the yard and parking lot areas are paved and tend to be flat with little if any short circuiting of flow.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

■ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? 01

***NOTE:** Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:
MAR05E690

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA Shipping and Receiving Yard :

1. Brief Description:

Shipping and Receiving Yard is located in the southern quarter of the east side of the building. The yard in the past was use for outside storage of materials the included empty drums, skids, certain metal equipment, as well as transient storage for trash containers and some scrap metals. We developed policies and practices to ensure that all the materials, drums, skids, scrap and wastes are placed under cover or not stored outside the building. Materials found in the yard a transitory where they typically are place there for a few hours while awaiting pick up, storage, or other disposition.

Note the shipping and receiving yard is an on going issue and the Shipping and Receiving Yard policies and practices are routinely reviewed for effectiveness.

2. Are any control measures in need of maintenance or repair? ☐ YES ■ NO

3. Have any control measures failed and require replacement? ☐ YES ■ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ■ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA Parking Lot A :

1. Brief Description:

Parking Lot A is located on the west side of the building and exists for employee vehicle parking. There is also a covered receiving dock located in the area toward the southwest corner of the lot. The dock is infrequently used but does receive chemcial drums containing acids, soaps, and hydrogen peroxide. Behind the just south of the dock the is a set of oil filled pad mount transformrs and some service shed use to store lawn care type equipment.

2. Are any control measures in need of maintenance or repair? ☐ YES ■ NO

3. Have any control measures failed and require replacement? ☐ YES ■ NO

4. Are any additional/revised c necessary in this area? ☐ YES ■ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA Facility Roof :

Brief Description:

There is no industrial activity on the facility roof that presents a storm water issue. There are numerous vents to exhaust various air emissions some of which are associated with permitted processes. There is a maintenance shed located on the roof where there may be some chemicals stored within and in containment.

2. Are any control measures in need of maintenance or repair? ☐ YES ■ NO

3. Have any control measures failed and require replacement? ☐ YES ■ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ■ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
MAR05E690

***NOTE:** Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA Yard (Melt and Casting Rooms Dust Collectors and Cryogenic Gas Storage):

1. Brief Description:

This yard is located in the upper half of the east side of the building where the Melt and Casting Rooms Dust Collectors and cryogenic gas storage (nitrogen, argon, and hydrogen tanks) can be found. Generally this yard requires very little care. The dust collectors are cleaned biannually and their filters are replaced if necessary by maintenance employees. Since the dust is precious metal bearing great care is exercised to ensure there is no loss of dust to the environment. There is a small shipping dock is this area this use is limited to metal alloy product shipment. The dock is cover and presents no stormwater exposure. Very little maintenance work is conducted the yard and one or two company vehicles may be parked there when not making deliveries.

2. Are any control measures in need of maintenance or repair? ☐ YES ■ NO

3. Have any control measures failed and require replacement? ☐ YES ■ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ■ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
MAR05E690

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 01 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ■ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ■ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

A drum of spent propylene glycol was left in the yard by contractors who serviced a chiller unit. The chiller unit in an area where there is little activity. A CAR was issued concerning the chiller unit and improper storage spent chemicals. This drum was in violation of the company's written policies and practices concerning chemical management and yard management. Coincidently there were certain house keeping activities had changed

Trash that may contain precious metal was routinely bundles and strapped and stored within the building. The bundled trash was later transfer to and enclosed trailer which is later trucked to a New Hampshire refinery. In an effort to not to store trash in the building the cleaning staff started to store the bundled trash in the shipping and receiving yard on skids. The were typically four or five bundles in the yard as well as a dozen or so empty pallets stock piled for future use. Company policies disallow storage of exposed material such as bundled trash and skids in the yard.

5. Date problem identified: 07/16/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ■ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

The drum of spent propylene glycol was immediately removed dorm the yard and place in the proper storage area within the building for temporary storage where waste chemical as store prior to shipping and off site disposal.

We discussed storage issues in the yard with the Departments and employees responsible for placing the materials in the yard and reviewed the policy again to ensure that such issues do not recur. Materials placed in the yard for transient storage such as trash bundles and skids are be placed under fixed cover or place on pallets and covered with tarps.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ■ NO

9. Date corrective action initiated: 07/16/2012

10. Date correction action completed: 09/12/2013 or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
MAR05E690

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ■ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: FRED POLUHOVICH Title: SR VP MANUFACTURING

Signature: [signature] Date Signed: 10/23/2012

Leach Garner
PO Box 358
49 Pearl Street
Attleboro, MA 02703
October 23, 2012

U.S. Environmental Protection Agency
Office of Water, Water Permits Division
Mail Code 4203M, ATTN: MSGP Reports
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Sir:

I have enclosed the 2012 Annual Stormwater Report as required by the NPDES Multi-Sector General Permit (MSGP) Section 7.2, Annual Reporting, for report for the LeachGarner sites located at 49 Pearl Street and 200 East Street, both locations in Attleboro, MA, Permit No.'s MAR05E690 and MAR05E778 respectively.

I trust that you will find these reports complete. Should you have any questions regarding this report, please feel free to contact me at (508) 222-7400, extension 1205.

Sincerely

David Regan
Environmental Compliance